

1. I am a Fire Official with the City of Newark Department of Public Safety – Fire Division in the State of New Jersey.
2. I make this Declaration in support of the City’s Motion for Injunctive Relief and Temporary Restraints.
3. On March 31, 2025, I arrived at the Delaney Hall Detention Facility, located at 451 Doremus Avenue, Newark, New Jersey 07105, around 9:00 am. with Engine 16.
4. Battalion Chief Kenneth Perez and I asked several times to gain entry into the facility with members of the Newark Fire Division to test the elevators.
5. Around 10:00 a.m., Assistant Facility Administrator Mr. Luis Soto, Administrator Lee Tatum, and a security guard denied us access to test the elevator recall.
6. The premises are being occupied without the necessary Fire Certificate.
7. I issued four fire code violations to the facility:
 - a. failure to provide entry to the facility in violation of Code Section 5:70-2.1(C);
 - b. failure to provide an evacuation plan in violation of Code Section 3201.4;

c. failure to provide a current elevator test report in violation of Code Section 917.1;
and

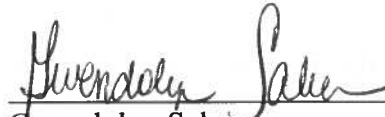
d. failure to provide a generator test report in violation of Code Section 1203.4.2.1
for the facility's emergency generator.

8. Based on my training and experience, the lack of an inspection presents an immediate and significant risk to the lives of the occupants and the City's emergency responders.

9. Given the immediate potential danger to the public, I respectfully request that the Court grant an Order requiring Defendants to provide the necessary access to allow for inspection and compliance with all relevant fire, health, and life safety regulations.

I declare under penalty of perjury that I have read the foregoing and that it is true and correct to the best of my knowledge.

Dated: 4/10/25



Gwendolyn Saleem
Fire Official, City of Newark